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*Blue Macaw Mexican Restaurant LLC,*  
*Edmon Haddad and Penny Haddad*

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

KIND MACAYO, LLC, an Arizona limited,  
 liability company,

Plaintiffs,

vs.

BLUE MACAW MEXICAN RESTAURANT  
 LLC, a Nevada limited liability company,  
 EDMON HADDAD, an individual, and  
 PENNY HADDAD, an individual, and  
 MACAYO VEGAS, INC., a Nevada  
 Corporation,

Defendants.

) Case No. 2:19-cv-01451-JAD-VCF  
 )  
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 )

) **STIPULATION AND**  
 ) **ORDER EXTENDING TIME FOR**  
 ) **THE HADDAD DEFENDANTS TO**  
 ) **FILE RESPONSES TO (i) VERIFIED**  
 ) **COMPLAINT, AND (ii) MOTION**  
 ) **FOR PRELIMINARY INJUNCTION**

) **(Fourth Request)**  
 )  
 )  
 )

Pursuant to Local Rules IA 6-1, 6-2 and LR 7-1, the undersigned counsel of record for Plaintiff Kind Macayo, LLC and Defendants Blue Macaw Mexican Restaurant LLC, Edmon Haddad, and Penny Haddad (collectively the “Haddad Defendants”) hereby STIPULATE: (i) to extend the time for the Haddad Defendants to file their response to the Verified Complaint (ECF No. 1); and (ii) to extend the time for the Haddad Defendants to file their response to Plaintiff’s Motion for Preliminary Injunction (ECF No. 4). The Haddad Defendants’ responses to the Verified Complaint are due on October 18, 2019. (See ECF No. 35) (order granting third extension request). The Haddad Defendants’ responses to the Motion for Preliminary Injunction are due on

October 11. (*Id.*) If approved, the forgoing parties have agreed to a two-week extension of time for the Haddad Defendants to file their responses to the Verified Complaint and the Motion for Preliminary Injunction, respectively. Accordingly, the Haddad Defendants' response to the Verified Complaint would be due on **November 1, 2019**, and their response to the Motion for Preliminary Injunction would be due on **October 25, 2019**. The Haddad Defendants agree that Plaintiff's agreement to the foregoing extension of time shall not be used by them to support any defense or argument based on the doctrine of laches. This is the fourth stipulation seeking to extend the subject deadlines.

The parties submit that good cause exists for approval of the requested extensions as the parties have continued to be engaged in meaningful settlement negotiations to determine whether this case can be promptly settled, and have, in-fact, made substantial progress in their settlement negotiations. Since the time of the parties' last stipulation, they have prepared a draft written settlement agreement, exchanged multiple edits and comments thereon, and expect to be able to finalize the document before the extended deadlines requested herein. Further good cause exists for the requested extension as Plaintiff's counsel will be in trial from October 15 -18, and counsel for the Haddad Defendants is out of the office from October 10 - 14, 2019, thus necessitating additional time to fully document the parties' proposed resolution.

The parties submit that the short extensions requested herein are not for purposes of delay.

DATED: October 9, 2019

Respectfully submitted,

CAMPBELL & WILLIAMS

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Kind Macayo, LLC*

IT IS SO ORDERED:

  
UNITED STATES DISTRICT JUDGE  
Dated: October 15, 2019.